UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076 Case No: 1:23-md-03076-KMM

FTX Cryptocurrency Exchange Collapse Litigation	_
THIS DOCUMENT RELATES TO:	
Domestic Investor Defendants	
	/

IN RE:

DOMESTIC INVESTOR DEFENDANTS' RESPONSE TO PLAINTIFFS' OMNIBUS MOTION TO LIFT DISCOVERY STAY AND FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY, AND, IF NECESSARY TO AMEND THEIR COMPLAINTS WITH ANY FACTS ARISING FROM SUCH DISCOVERY

We write on behalf of the Domestic Investor Defendants¹ regarding Plaintiffs' November 3, 2023 Omnibus Motion ("Motion," ECF No. 348). As the Motion makes clear and as Plaintiffs have separately confirmed in correspondence, the Motion seeks relief only with respect to certain defendants that filed motions to dismiss based on lack of personal jurisdiction, and not with respect to any of the Domestic Investor Defendants, *see id.* at 1-2. As a result, the Domestic Investor Defendants do not take any position on the Motion but reserve all rights in the event that Plaintiffs move in the future to lift the stay of discovery as to the Domestic Investor Defendants.

Altimeter Capital Management, LP, K5 Global Advisor, LLC, Multicoin Capital Management LLC, Paradigm Operations LP, Ribbit Capital, L.P., Sequoia Capital Operations, LLC, SkyBridge Capital II, LLC, Thoma Bravo, LP, and Tiger Global Management, LLC.

Dated: November 17, 2023

/s/ Rishi N. Zutshi

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 17, 2023, a true and correct copy of the foregoing has been furnished by electronic filing with the Clerk of the Court via CM/ECF, which will send notice of electronic filing to all counsel and parties of record.

/s/ Todd Pittenger

T. Todd Pittenger

Counsel for Defendant Paradigm Operations LP